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May 1, 2003

Via Hand Delivery

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *American Cellular Corporation E911 Quarterly Report –
CC Docket No. 94-102*

Dear Ms. Dortch:

American Cellular Corporation and its subsidiaries, by its attorneys, hereby submit the attached Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lee J. Rosen

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau
Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau
John Ramsey, Executive Director, APCO
Robert M. Gurss, Counsel, APCO
Terry Peters, Executive Director, NENA
James R. Hobson, Counsel, NENA and NASNA
Evelyn Bailey, NASNA

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DATE

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("Order to Stay").

E911 Status – Quarterly Report

CC Docket No. 94-102

May 1, 2003

Summary of Report

Pursuant to the *Order to Stay*,¹ American Cellular Corporation,² as a Tier II carrier, provides in this Quarterly Report (“Report”) information on all pending requests for Phase I and Phase II it has received, including the entity requesting service, the date the request was received,³ and the status of the request. For Phase I requests that have been pending for over six months or for which the March 1, 2003 Phase II deployment date has passed, ACC has also included the projected deployment date (if available) and a brief description of the reasons for the delay and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

Phase I Service

ACC has received 77 requests for Phase I services and has activated service in all or in part in 65 of these jurisdictions. ACC has worked diligently with its third-party location solution vendor Intrado, as well as the public safety community, in coordinating Phase I deployment.

As previously reported, ACC continues to treat the remaining 3 fully-pending and 9 partially-pending Phase I requests as valid for purposes of good faith, although all would no longer be active pursuant to Section 20.18(j) and the *Richardson* criteria.⁴ The company remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, ACC is a mid-sized carrier servicing predominantly rural and suburban markets in 11 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment. As a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

ACC’s network consists of approximately 8 Mobile Switching Centers, all of which utilize equipment manufactured by Nortel Networks (“Nortel”). ACC has worked with Nortel to prepare for Phase II deployment; all switch upgrades necessary to supply Phase II services were completed by Nortel by June, 2002.

¹ See *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) (“*Order to Stay*”).

² This Report is being filed on behalf of American Cellular Corporation and its subsidiaries (collectively “ACC”).

³ As indicated in the table, the provided “request date” indicates the date the PSAP/requesting entity sent its request to ACC. This date may not correspond with the date the PSAP’s/requesting entity’s request was “valid” per Section 20.18(j) of the rules.

⁴ 47 C.F.R. § 20.18(j); *Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, Order, 16 FCC Rcd 18982 (2001) (“*Richardson*”).

In addition, ACC has executed an exclusive contract with Grayson Wireless to provide the PDE equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in response to the PSAP requests in Hocking County, OH; the State of Minnesota; Rowan County, KY; and Montgomery County, KS as discussed below. ACC is currently deploying Phase II services to these jurisdictions in accordance with mutually agreed to timetables which have been negotiated or are currently under discussion with PSAPs.

B. Phase II Requests

ACC has received requests for Phase II service from the following jurisdictions: Hocking County, OH; the State of Minnesota; Rowan County, KY; Schohaire and Otsego Counties, NY; and Montgomery County, KS. The status of these requests is detailed in the attachment. For each active request, ACC is proceeding with deployment, and proceeding in good faith even for PSAPs who have not yet provided *Richardson* documentation.

C. Deployment Issues

In Hocking County, despite its best faith efforts, ACC's network design may render meeting these accuracy standards impossible. As mentioned above, ACC provides service via only one cell tower. ACC is proceeding with Phase II deployment, but has yet to resolve the manner in which it will meet the accuracy standards. ACC has engaged in discussions with a prominent nationwide carrier to discuss the possibility of collocating E911 facilities antennas on each other's tower's to facilitate the Grayson solution's triangulation techniques. This plan has yet to come to fruition and may ultimately prove cost-prohibitive or infeasible from an engineering perspective. ACC has sent the co-location application to the nationwide carrier and are waiting on tower structurals.

Furthermore, in discussions with Grayson Wireless, ACC has learned that leasing and zoning issues may affect ACC's ability to meet the interim deployment deadlines in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, Grayson Wireless has informed the company that it will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival ("TDOA") equipment that will be installed in individual cell sites. ACC has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

Furthermore, ACC brought similar matters to the Commission's attention in its original waiver request.⁵ Accordingly, if necessary, ACC may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁶

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSAs.

⁵ See American Cellular Corporation Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁶ See *Order to Stay* at ¶ 41.

**American Cellular Corporation
Wireless E9-1-1 Phase I & II
Service & "Request" Summary**

STATUS OF PHASE I DEPLOYMENT --

State	County	Requesting Entity Name	Request Date¹	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KY	Laurel/ London	Laurel/ London County	11/16/00	Service activated 11/28/01 PSAP certified but not capable of receiving and utilizing Phase I data.		
KY	Barren	Barren/Metcalf	N/A	Service activated 11/27/01		
KY	Nelson	Nelson County	N/A	Service activated 11/27/01 to Kentucky State Police Post # 4		
KY	Rockcastle	Rockcastle County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	Wayne	Wayne County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	McCreary	McCreary County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	Mason	Mason County	N/A	Service activated 8/29/01		
KY	Hart	Hart County	N/A	Service activated 8/21/01 to Kentucky State Police Post # 3		
KY	Danville	Danville County	N/A	Service activated 8/14/01		
KY	Boyle	Boyle County	N/A	Service activated 8/14/01		
KY	Bath	Bath County	N/A	Service activated 6/05/01		

¹ Indicates date PSAP sent letter to ACC requesting service; does not correspond with date PSAP's request was "valid" per Section 20.18(j) of the rules.

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				to Kentucky State Police Post # 8		
KY	Lewis	Lewis County	N/A	Service activated 6/05/01 to Kentucky State Police Post # 8		
KY	Menifee	Menifee County	N/A	Service activated 5/31/01 to Kentucky State Police Post # 7		
KY	Lincoln	Lincoln County	N/A	Service activated 5/31/01 to Kentucky State Police Post # 7		
KY	Russell	Russell County	N/A	Service activated 5/18/01 to Kentucky State Police Post # 15		
KY	Cumberland	Cumberland County	N/A	Service activate 5/18/01 to Kentucky State Police Post # 15		
KY	Clinton	Clinton County	N/A	Service activated 5/18/01 to Kentucky State Police Post # 15		
KY	Spencer	Spencer County	N/A	Service activated 8/09/01 to Kentucky State Police Post # 12		
KY	Montgomery	Montgomery County	N/A	Service activated 9/19/01 to Kentucky State Police Post # 8		
KY	Madison	Madison County	N/A	Service activated 7/13/01		
KY	Morehead/Rowan	Morehead/Rowan County	11/09/01	Service activated 12/07/01 to Kentucky Police Post # 8.		
KY	Adair	Adair County	07/02/01	Service activated 12/06/01		

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KY	Monroe	Monroe County	01/04/01	Service activated 3/21/02 PSAP certified but not ready to receive Phase I data due to CPE.		
KY	Taylor	Taylor County	12/04/00	Service activated 3/22/02 Trunks from LEC delayed. PSAP certified but not ready to receive Phase I data due to CPE.		
KY	Mercer	Mercer County	04/30/01	Service activated 5/01/02 (PSAP was not Phase I capable at time of request.) PSAP trunks from Selective Router to PSAP not ready.		
KY	Pulaski	Pulaski County	07/17/00	Service activated 12/05/01 PSAP was certified but not ready to receive Phase I data due to CPE.		
KY	Anderson	Anderson County	02/28/01	Service activated 2/18/02 Trunks from Selective Router to PSAP not correct.		
KY	Hardin	Hardin County	07/06/00	Service activated 12/20/01 PSAP was awaiting certification from the CMRS Board. CPE not ready.		
KY	Larue	Larue County	07/17/00	Service activated 12/19/01 PSAP was not Phase I capable at the time of		

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				request. PSAP CPE not ready. PSAP requested address changes and RF Maps.		
KY	Green	Green County/Greensburg	12/12/00	Service activated 12/11/01 PSAP was awaiting certification from the CMRS Board. Trunking problems with the LEC. PSAP CPE not ready.		
KY	Casey	Casey County	N/A	Service activated 12/14/01 to Kentucky State Police Post # 15		
KY	Bracken	Bracken County	N/A	Service activated 4/19/02 to Kentucky State Police Post # 6		
KY	Nicholas	Nicholas County	N/A	Service activated 4/19/02 to Kentucky State Police Post # 6		
KY	Robertson	Robertson County	N/A	Service activated 4/23/02 to Kentucky State Police Post # 6		
WV	Marion	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 4/11/01 PSAP cost recovery issues.		
WV	Monongalia	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 3/30/01 PSAP cost recovery issues.		
WV	Harrison	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 3/30/01 PSAP cost recovery issues.		
WV	Preston	Office of Emergency	06/01/00	Service activated 4/11/01		

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		Management of the State of West Virginia		Cost recovery issues.		
WV	Taylor	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 8/27/02 PSAP CPE not capable.		
MI	Marquette	Michigan Communications Director Association	04/30/01	Service activated 2/21/02 State administrative issues.		
MI	Dickinson	Michigan Communications Director Association	04/30/01	Service activated 2/21/02 State administrative issues.		
MI	Menominee	Michigan Communications Director Association	04/30/01	Service activated 2/25/02 State administrative issues.		
MI	Iron	Michigan Communications Director Association	04/30/01	Service activated 2/27/02 State administrative issues.		
MI	Ontonagon	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy. Did not receive formal request from Ontongaon Co. as calls are to be routed to Negaunee PSAP instead. Received confirmation that PSAP is not Phase I capable until May 2003.	Alternate date will be discussed with PSAP.
MI	Keweenaw	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy. Did not receive formal request from Ontongaon Co. as calls are to be routed to Negaunee PSAP instead. Received confirmation that PSAP is not Phase I capable until May 2003.	Alternate date will be discussed with PSAP.
MI	Houghton	Michigan	04/30/01	Service activated 3/28/02.		

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		Communications Director Association		Administrative issues.		
MI	Baraga	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability	ACC is ready to deploy. Did not receive formal request as calls are to be routed to Negaunee PSAP instead. Received confirmation that PSAP is not Phase I capable until May 2003.	Alternate date will be discussed with the PSAP.
MI	Gogebic	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not have Enhanced 9-1-1.	ACC is ready to deploy. Did not receive formal request as calls are to be routed to Negaunee PSAP instead. Received confirmation that PSAP is not Phase I capable until May 2003.	Alternate date will be discussed with the PSAP.
MN	Aitkin	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing information from state. Testing began in February 2003. 1 of 6 cell sites activated on 2/18/03. Remaining cell sites activated on 3/20/03.	Conference calls with State, Carrier and Third party provider.	
MN	Becker	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	2 of 4 sites activated on 6/27/02. Third site activated on 12/30/02. Had to await approval by State for mapping and routing technology for remaining 1 cell site. Activated remaining cell site on 2/12/03.	Conference calls with State, Carrier and Third party provider.	
MN	Beltrami	State of Minnesota,	01/31/01	2 of 3 cell sites activated	Conference calls with State,	TBD

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		Department of Administration, Statewide 9-1-1 Program		on 7/10/02. State: Awaiting approval by State for mapping and routing technology for remaining cell site.	Carrier and Third party provider. Further testing planned.	
MN	Carlton	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology. Testing on 2/7/03 unsuccessful.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Cass	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	8 of 12 cell sites activated on 7/10/02. State: Awaiting approval by State for mapping and routing technology for remaining 4 cell sites. Testing on 2/7/03 and 3/17/03 unsuccessful.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Crow Wing	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing approval. Testing began in February 2003. 8 of 14 cell sites deployed on 2/14/03. 2 cell sites deployed on 3/17/03.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Douglas	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 6/27/02. State administrative issues.		
MN	Grant	State of Minnesota, Department of	01/31/01	Service activated on 7/08/02. State		

State	County	Requesting Entity Name	Request Date ¹	Status/Reason for Delay	Steps Taken to Resolve / Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		Administration, Statewide 9-1-1 Program		administrative issues.		
MN	Hubbard	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	Conference calls with State, Carrier and Third party provider.	
MN	Itasca	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	7 of 8 cell sites activated on 7/12/02. State: Awaiting approval by State for mapping and routing technology for remaining cell site.	Conference calls with State, Carrier and Third party provider.	
MN	Kanabec	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 7/03/02. Administrative issues.		
MN	Koochiching	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing approval. Testing initiated February 2003. Test calls in February unsuccessful.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Lake	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing approval. Testing to begin in February 2003. Test calls in February unsuccessful.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Mille Lacs	State of Minnesota, Department of Administration, Statewide	01/31/01	Had to await approval by State for mapping and routing technology.	Conference calls with State, Carrier and Third party provider.	

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems (if Requests Pending Over 30 Days)	Expected Deployment Date
		9-1-1 Program		Service activated on 2/18/03.		
MN	Morrison	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology. Mapping and routing received from state. 4 of 5 cell sites deployed on 3/17/03. Remaining cell site deployed on 3/18/03.	Conference calls with State, Carrier and Third party provider.	
MN	Otter Tail	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 6/27/02. Administrative issues.		
MN	Pine	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	5 of 7 cell sites activated on 6/27/02. Received approval of mapping and routing of all sites. Testing initiated February 2003. Test calls in February unsuccessful.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Pope	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received approval of mapping and routing. Testing initiated February 2003. 1 of 2 cell sites activated on 2/19/03.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	St Louis North	State of Minnesota, Department of Administration, Statewide	01/31/01	14 of 17 cell sites activated on 8/02/02. Had to await approval by	Conference calls with State, Carrier and Third party provider.	

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		9-1-1 Program		State for mapping and routing technology for remaining 3 cells. Service activated on remaining cell sites 2/13/03.		
MN	St Louis South	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	18 of 26 cell sites activated on 8/23/02. Had to await approval by State for mapping and routing technology for remaining 8 cells. 3 of 32 cell sites deployed on 2/17/03.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Swift	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 5/06/02. Administrative issues.		
MN	Todd	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received approval of mapping and routing. Testing initiated February 2003. 2 of 6 cell sites deployed on 3/17/03.	Conference calls with State, Carrier and Third party provider. Further testing planned.	TBD
MN	Wadena	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 5/06/02. Administrative issues.		
MN	Wilkin	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received approval of mapping and routing. Service activated on 2/12/03.	Conference calls with State, Carrier and Third party provider.	

State	County	Requesting Entity Name	Request Date ¹	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
OH	Hocking	Hocking County	03/01/02	Service activated on 6/18/02.		
KS*	Montgomery	Montgomery County	7/15/02	Deployment underway. At time of request, the PSAP did not have trunking from the S/R. Nevertheless, ACC began the process of deploying Phase I services, and the PSAP has since obtained the trunking LEC required login ID for ALI DB provisioning.	ACC has worked closely with the PSAP and has worked diligently to deploy Phase I services. Obtained login ID and provisioned ALI DB.	07/15/03
NY*	Schoharie	New York State Police	11/4/02	N/A	N/A	5/5/03
NY*	Otsego	Otsego County 9-1-1	02/20/03	N/A	N/A	08/20/03
NY	Ulster	Ulster County 9-1-1	02/07/03	N/A	N/A	08/07/03

STATUS OF RESPONSE TO PHASE II INQUIRIES/REQUEST--

State	County	Requesting Entity Name	Request Date	Status	Steps Taken to Resolve Deployment Problems	Expected Deployment Date
MN*	All counties serviced by ACC as listed above in Phase I Table.	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	1/31/2001	<ul style="list-style-type: none"> - ACC responded to State of Minnesota ("State") by letter, (dated 4/17/2001), requesting verification of Phase II capabilities and cost recovery mechanism. - State did not respond to request. - ACC filed Petition for Waiver of FCC's Phase II rules (9/4/01). - State of Minnesota filed letter (dated 9/11/01) with FCC seeking correction to text of ACC's Petition for Waiver. - ACC replied again requesting documentation of readiness. - To date, ACC has not received demonstration from the State re: its Phase II capabilities or the status of a cost recovery mechanism. - ACC sent letter (dated 	ACC has made repeated attempts to confirm County's Phase II capabilities and whether it has a cost recovery mechanism in place for Phase II deployment.	ACC no longer considers MN's Phase II request active and has no plans to deploy Phase II in the state until it receives a new request or documentation pursuant to <i>Richardson</i> criteria.

				1/9/03 requesting documentation of readiness. To date, ACC has not received demonstration from the State re: Phase II capabilities or the status of cost recovery mechanism.		
KY	Rowan	Morehead Police	5/15/02	<p>- ACC responded to Rowan County ("County") by letter, (dated 5/22/2002) requesting demonstration of capabilities and cost recovery mechanism to which there was no reply.</p> <p>- ACC sent second letter on 7/30/02 requesting verification of readiness.</p> <p>- County replied by letter (received 8/19/2002) notifying ACC that it employs a NCAS Phase I solution and that a third-party vendor has scheduled Phase II software upgrades</p> <p>- ACC sent follow-up correspondence (dated 8/28/02), requesting clarification of the information provided 8/19/02, and complete demonstrations of readiness pursuant to <i>Richardson</i>.</p> <p>ACC has received no response to its 8/26/02</p>	<p>ACC has made repeated attempts to confirm County's Phase II capabilities and whether it has a cost recovery mechanism in place for Phase II deployment.</p> <p>ACC has been contacted by LEC (Alltel) to discuss their implementation schedule for providing the necessary tandem and trunking upgrades. ACC has left voice message with LEC to call back to discuss.</p>	ACC is proceeding with Phase II in county and is involved in ongoing discussions with PSAP to determine alternative date.

				<p>correspondence.</p> <ul style="list-style-type: none"> - ACC sent letter 11/26/02 requesting statement of readiness in writing. - Rowan responded with letter (12/3/02) but provided no documentation - ACC sent further follow-up letter (dated 1/9/03) requesting information of readiness and cost recovery mechanism. <p>County replied by letter (dated 1/14/03) stating without documentation that PSAP has mechanism for cost recovery, has deployed Phase I with an NCAS solution, and LEC notified of intent to implement Phase II and has requested all necessary software and hardware upgrades.</p>		
KS	Montgomery	Montgomery County*	7/15/02	<ul style="list-style-type: none"> - Because of complications with Phase I deployment in Montgomery County, ACC sent correspondence to County (dated 10/29/02) requesting demonstration of readiness pursuant to <i>Richardson</i>. <p>County replied by letter (dated 11/25/02) stating that a cost recovery mechanism is in place and</p>	N/A	ACC is in discussions to work out an alternative target launch date for delivery of Phase II services with County.

				that all equipment has been ordered for upgrade.		
OH	Hocking	Hocking County	03/11/02	<ul style="list-style-type: none"> - ACC responded to County by letter, (dated 4/15/2002) requesting documentation of capabilities and cost recovery mechanism. - County replied to this letter on 4/16/2002 notifying ACC of particular Phase II compliant capabilities. - ACC sent letter 10/3/02 notifying County that it is considering request to be "valid" and plans to deliver Phase II services by 3/1/03, but also is requesting documentation pursuant to <i>Richardson</i>. - County replied by letter (dated 10/7/02) stating County fully Phase II compliant and that LEC has indicated no cost recovery mechanism in place, but will not cause delay. - ACC replied by letter (dated 1/10/03) requesting copies of documentations for necessary funding and upgrade order to the LEC. 	N/A	Date TBD. ACC maintains only one cell site and accuracy may be a problem in the County. ACC has maintained contact and continued to work with PSAP to resolve deployment issues. ACC has discussed other potential options including possible collocation with other carriers or on PSAP towers. ACC intends to deploy fully once these issues can be resolved. Working with other carrier on co-locate agreement

				<ul style="list-style-type: none"> - County replied by letter (dated 1/13/03) stating that Phase II is in service with 2 of 5 wireless carriers in county. - ACC signed contract with Grayson Wireless 12/13/02 to provide network-based solution. 		
NY*	Schoharie	New York State Police	11/4/02	<ul style="list-style-type: none"> - ACC sent letter 11/13/02 to request documentation pursuant to <i>Richardson</i>. - County responded with letter (12/30/02) but provided no documentation. - ACC will treat request as valid and intends to deploy in timely manner. 	N/A	5/5/03
NY*	Otsego	Otsego County 9-1-1	02/20/03	N/A	N/A	08/20/03

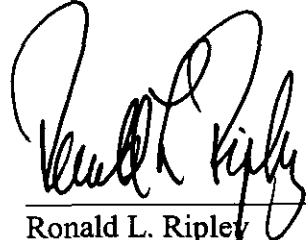
* Contact indicated entity was "requesting" deployment of both Phase I and Phase II services.

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of American Cellular Corporation ("ACC").

I have reviewed the ACC E911 Phase II Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.



Ronald L. Ripley
Secretary

Executed on: April 30, 2003

CERTIFICATE OF SERVICE

I, LaTashia T. Williams, hereby certify that on the 1st day of May 2003, copies of the foregoing "Quarterly Report" were sent by first class mail, postage pre-paid, or by hand delivery (*) to the following:

David H. Solomon*
Chief
Enforcement Bureau
Federal Communications Bureau
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Washington, D.C. 20554

John Muleta*
Chief
Wireless Telecommunications Bureau
Federal Communications Commission
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